

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 1997

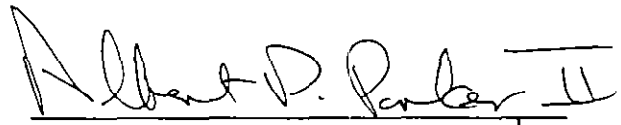
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
DOCKET NO. R97-1

**FOURTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS NIETO
(UPS/USPS-T2-45 through 49)**

(September 17, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Nieto (UPS/USPS-T2-45 through 49).

Respectfully submitted,



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Of Counsel.

**FOURTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS NIETO**

UPS/USPS-T2-45. Please refer to part 4 of Library Reference H-82;
specifically refer to the TRACSSMN.Z.HIGHWAY.PQ196.SURVEY.TEXT data file and
the TRACSSMN.Z.HIGHWAY.PQ196.SAMPLE.DATA data file.

- (a) Please explain the extent to which TRACS tests the SURVEY and SAMPLE data to insure no logical inconsistencies exist, such as a sample where the cubic feet of mail exceeds the cubic feet of the vehicle's capacity.
- (b) Please confirm the vehicle cubic foot capacity for the following samples (TESTID, CAPACITY): 77046RX, 45; 77756JL, 48; 70066XC, 22; 73066IA, 45; 70706UW, 28; 77056JZ, 45; 73076UN, 45. If not confirmed, please explain.
- (c) Please confirm the cubic footage of the sampled pallets $[(P1HEIGHT * P1LENGTH * P1WIDTH / 1728) + P2HEIGHT * P1LENGTH * P1WIDTH / 1728]$ for the following samples (TESTID, Cubic Footage of Sampled Pallets): 77046RX, 133; 77756JL, 126; 70066XC, 78; 73066IA, 70; 70706UW, 48; 77056JZ, 62; 73076UN, 47. If not confirmed, please explain.
- (d) If (b) and (c) are confirmed, please explain how the cubic footage of sampled pallets on a vehicle can be greater than the cubic footage of the vehicle's capacity.
- (e) Please confirm that your responses are also applicable to PQ 2 FY 96, PQ 3 FY 96, and PQ 4 FY96. If not confirmed, please explain.
- (f) Are your responses also applicable to other parts of TRACS? Please explain.

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TO UNITED STATES POSTAL SERVICE WITNESS NIETO**

UPS/USPS-T2-46. Please refer to USPS Library Reference H-82

(TRACS Highway Sample Design Programs and Documentation). Please provide machine readable input and output files, as shown on pages 6-8, by quarter for FY 96 for Motor Vehicle Service (MVS) containing similar information as the following Highway Contract Route TRACS files including but not limited to these files:

- (a) LAXSTN.PS272D13;
- (b) TRACSSMN.NASS****.FY96.TEXT.

UPS/USPS-T2-47. In reference to interrogatory USPS-T2-46 above, if data variables or sets of variables, description of input, and output data file organization, and source codes, are different from those for the highway contract files,


- (a) identify all such differences; and
- (b) provide complete documentation and copies (machine readable where appropriate) for these differences.

UPS/USPS-T2-48. In reference to interrogatory USPS-T2-46 above, if MVS requested information is not available for each quarter in 1996, provide the four most recent quarters of such information available.

UPS/USPS-T2-49. Please provide the height of storage space for each vehicle cubic foot capacity in the TRACS highway sample. For example, provide the height of storage space for all vehicles with a 2700 cubic foot capacity.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.


Stephanie Richman

Dated: September 17, 1997
Philadelphia, PA